

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 5379 & 5955

**CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On January 4, 2024, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Entry of an Order Authorizing and Approving (I) FTX Trading Ltd.’s and FTX Property Holdings Ltd.’s Entry Into, and Performance of their Obligations Under, the Bahamas Properties Exclusive Sales Agency Agreement, (II) Procedures for the Sale or Transfer of Certain Bahamas Properties, and (III) Assumption, Assignment and Rejection Procedures* [D.I. 5379] (the “Motion”).

2. On January 18, 2024, the Official Committee of Unsecured Creditors (the “Committee”) filed *The Official Committee of Unsecured Creditors’ Joinder to Motion of Debtors for Entry of an Order Authorizing and Approving (I) FTX Trading Ltd.’s and FTX Property Holdings Ltd.’s Entry Into, and Performance of Their Obligations Under, the Bahamas Properties Exclusive Sales Agency Agreement, (II) Procedures for the Sale or Transfer of Certain Bahamas Properties, and (III) Assumption, Assignment and Rejection Procedure* [D.I. 5955] (the “Joinder”).

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. As of the date hereof, no formal objections or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the “Informal Comments”) to the proposed form of order filed with the Motion from the Office of the United States Trustee (the “U.S. Trustee”).

4. To resolve the Informal Comments, the Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached hereto as **Exhibit B**. The Revised Order has been circulated to the U.S. Trustee, the Committee and the Joint Official Liquidators of FTX Digital Markets Ltd. (in Liquidation) (the “JOLs” and, collectively with the U.S. Trustee and the Committee, the “Parties”). The Parties have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

5. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: January 27, 2024  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Alexa J. Kranzley (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: dietdericha@sullcrom.com  
bromleyj@sullcrom.com  
gluecksteinb@sullcrom.com  
kranzleya@sullcrom.com

*Counsel for the Debtors  
and Debtors-in-Possession*